

September 30, 2011

EX PARTE

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street S.W. Washington, D.C. 20554

Re: WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization; CC Docket No. 96-45, Federal-State Joint Board on Universal Service; WC Docket No. 03-109, Lifeline and Link Up; WC Docket No. 10-90, Connect America Fund; GN Docket No. 09-51, National Broadband Plan For Our Future; WC Docket No. 07-135, Establishing Just and Reasonable Rates For Local Exchange Carriers; WC Docket No. 05-337, High Cost Universal Service Support; CC Docket No. 01-92, Developing a Unified Intercarrier Compensation Regime

Dear Ms. Dortch:

On September 28, 2011, Dale Schmick, Chief Strategy Officer, YourTel America, Inc. and Chairman of the Board of COMPTEL, Jerry James, CEO of COMPTEL, Joseph Gillan of Gillan Associates and the undersigned met with Zachary Katz, Chairman Genachowski's Chief Counsel and Senior Legal Advisor, and Michael Steffen of the General Counsel's office regarding the above-captioned intercarrier compensation and universal service proceedings. Mr. James and Mr. Gillan separately met with Christine Kurth of Commissioner McDowell's office to discuss intercarrier compensation reform.

At both meetings, Mr. James and Mr. Gillan discussed the Competitive Amendment to the America's Broadband Connectivity Plan that COMPTEL filed with the Commission on August 24, 2011. The substance of their presentation is set forth on the attached document.

At the meeting with Messrs. Katz and Steffen, Mr. Schmick addressed matters at issue in the Lifeline/Link Up reform proceeding. He stressed the importance of developing a national database to verify customer eligibility for Lifeline/Link Up assistance and to identify and eventually eliminate duplicate claims for Lifeline service by a single consumer. He also highlighted the importance of the Commission maintaining Link Up reimbursement for service activation fees charged by both wireline and wireless carriers and reimbursement for toll

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limitation service for consumers who wish to control their telecommunications expenditures. COMPTEL's comments were consistent with the written submissions it made in these dockets on April 21, May 10, August 26, 2011.

If you have any questions or need additional information, kindly contact the undersigned.

Respectfully submitted,

/s/

Mary C. Albert

cc: Zachary Katz Michael Steffen Christine Kurth